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9 Attorneys for Defendant Sylviane Whitmore

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA,
13
14 Plaintiff,

15 vs.

16 SYLVIANE WHITMORE,
17 LARRY MCDANIEL,
18 Defendants.

Case No.: 2:17-cr-110 APG-DJA

**STIPULATION TO EXTEND
DEADLINES; PROPOSED ORDER**

19
20 The parties, Sylviane Whitmore, by and through her counsel, Lisa A. Rasmussen,
21 Larry McDaniel, by and through his counsel, Daniel Hill, and the United States, by and
22 through its counsel, Assistant United States Attorney Richard Anthony Lopez, hereby
23 stipulate as follows:

- 24 1. Presently, the supplemental briefing on McDaniel and Whitmore's Motions
25 for New Trial are currently due today, March 10, 2022. ECF 265.
26 2. Defense counsel need additional time to prepare the supplements because
27 they have requested that two subpoenas be issued per a sealed Rule 17 filing.
28

- 1 ECF 263. The subpoenas were issued on March 8, 2022 and defense counsel
2 received notice of that on March 9, 2022. ECF 268. The subpoenas have a
3 return date of March 31, 2022.
- 4
- 5 3. In consultation with the government, Defendants propose the following
6 extensions of time:
- 7 a. Whitmore and McDaniel's supplement's due on April 15, 2022;
8 b. Government's Response due on May 16, 2022;
9 c. Whitmore and McDaniel's Replies due on May 31, 2022.
- 10 4. The government agrees to these extended dates but does not waive any rights
11 to object to any procedural infirmities nor does this stipulation confer any
12 statutory extensions upon the defendants unless the court finds cause for the
13 same, which has yet to be determined.
- 14 5. The government's forfeiture motion, ECF 232, would continue to be held in
15 abeyance and the sentencing hearings set for April 21, 2022 will later be
16 adjusted by separate stipulation.
- 17 6. Denial of this request would cause prejudice to the Defendants Whitmore and
18 McDaniel and this request for an extension of time is not made for the
19 purpose of delay.

20 Dated this 10th day of March 2022.

21 **The Law Offices of Kristina Wildeveld & Associates,**

22
23 */s/ Lisa A. Rasmussen*

24 _____
25 LISA A. RASMUSSEN, ESQ.
26 Counsel for Sylviane Whitmore

27

1 **Hill Law Firm,**

2 */s/ Daniel Hill*

3 _____
4 DANIEL HILL, ESQ.
5 Counsel for Larry McDaniel

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7 **CHRISTOPHER CHIOU,**
8 **Acting United States Attorney**
9 **District of Nevada**

10 */s/ Richard Anthony Lopez*

11 _____
12 BY: RICHARD ANTHONY LOPEZ
13 Assistant United States Attorney

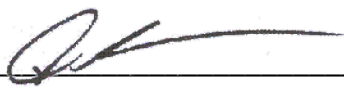
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15 **ORDER**

16 Pursuant to the Stipulation of the parties, and good cause appearing,

17 IT IS HEREBY ORDERED that the briefing schedule set on October 5, 2021 is
18 hereby extended as follows:

- 19 a. Whitmore and McDaniel's supplement's due on April 15, 2022;
20 b. Government's Response due on May 16, 2022;
21 c. Whitmore and McDaniel's Replies due on May 31, 2022.

22 Dated: March 14, 2022

23
24 
25 _____
26 The Honorable Andrew P. Gordon
27 United States District Judge
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